Index to Volume 24

Author Index

Brandon, David L., REIT Liability Hedges Under the IRS Hedging Regulations	167
Charyk, William R., The Partnership Corner: Proposed Regulations Simplify Tax Treatment of Surprise Partnership Terminations Recent Illustrations of the IRS's Search for Economic Reality in	87
Partnership Undertakings	220
Distributions of Marketable Securities Some Points Regarding Pension Plan Ownership of Real Estate	383
Partnership Interests	308
Cuff, Terence Floyd, Tax-Free Real Estate Transactions: How Do You Do an Exchange With a Special Purpose Entity	375
St. Laurent: Is There Still a Role for an Exchange Intermediary? What Does it Mean to Receive the Designated Property in an	77
Exchange? What Is a Single Exchange?	296 216
Friedrich, Craig W., Recent Developments: Section 1031 Not Lost by Failure to Follow Purchase Agreement or Identification of Twenty Possible Like-Kind Properties, But Is Lost for Failure to Replace in 180 Days. Section 1033 Ruled Applicable on Destruction of Principal Residence and Subsequent Sale of Land; Mortgage Interest Remains	102
Deductible During a Reasonable Period Until Reconstruction Complete	326
Defer Recognition of Gain on Sale Under Section 1034	230
Friedrich, Craig W., The Impact of the Final Check-the-Box Entity Classification Regulations on Real Estate	331
Gardner, Robert L., Randall, Boyd, & Stewart, Dave M., Does Razavi Provide a Blueprint for Section 280A Rental Agreements?	199

Gerson, Marc J., International Developments:	
An Overview of the FIRPTA Provisions and Recent Regulatory	
Developments	91
nizations Involving Foreign Investors of U.S. Real Estate Taxation of Equity Participation Rights in U.S. Real Estate Held	223
by Foreign Investors	391
The Importance of the Section 871(d) and Section 882 Election .	312
Howe, Victoria M., Automatic Revenue Procedure Allows Businesses to Recoup Missed Depreciation Deductions	189
Klein, Paul E., Recent Developments:	
IRS Requires Capitalization of Lease Termination Payment Where Purpose Is Move to Owner-Occupied Premises	320
New Proposed Regulations Published on Liability of Limited Partners for Self-Employment Tax	399
Lipman, Francine J. & Williamson, James E., Will Refinancing an Installment Sale Obligation Trigger Recognition of Gain?	287
Lux, Michael, Check-the-Box Proposed Regulations: An Instant Hit	27
Melone, Matthew A., The Proposed Section 467 Regulations: Long-Awaited Rules Introduce Complexity, Uncertainty, and Opportunities	261
1011 1 12 G 1 1 1 1 1 G 1	
Miller, Joel E., Condominiums and Cooperatives: All Section 216 Co-Ops Held Free of Section 277 But Subject to Subchapter T Deduction Limits	227
20 Test	99
Holmes Reversed; Co-Op Owners Held Subject to Section 280A	96
Tax Court Holds Allows Corporation to Exclude Transfer Charges as Capital Contributions, Joel E. Miller	229
Miller, Joel E., Which of a Nonexempt Co-Op's Earnings are Tax- Exempt Under Subchapter T	355
Novogradac, Michael J., The Low-Income Housing Credit: Tax Credit Recapture Avoidance—The Bond Posting Exception	

INDEX	TO	TIOI	TIME	04
INDEX	10	VUL	UIVIE	24

415

227

99

96

Rubin, Blake D. & Teplinsky, Steven B., A Comprehensive Guide to Partnership Terminations, Including the Impact of the New Schachat, Robert D., Final Regulations Under Section 469(c)(7): How 3 Schmalz, John, Brumbaugh, Mark, & Pillow, Roger, Underwater 408 Schneider, Willys, H., U.S. Tax Rules Affecting Investors in REITs . 40 Short, Andrew L., Debt Modifications Under the Final Cottage Savings Regulations 152 Sider, William E., Recent Letter Rulings Help Clarify the Tenant Services REITs May Provide Siegel, Robert S. & Boyle, Mary B., Sales of Real Estate With Contingent Payment Debt 243 Wilder, Gregory F. & Shaheen, William M., Tax Considerations in Eminent Domain Proceedings 51 Wood, Robert W., Charitable Contributions: Timing of Charitable Contribution and Intent 323 Wood, Robert W., The Home Office: Subject Index **Charitable Contributions** Timing of Charitable Contribution and Intent, Robert W. Wood ... 323 Condominiums and Co-Operatives All Section 216 Co-Ops Held Free of Section 277 But Subject to

Subchapter T Deduction Limits, Joel D. Miller

Further Thoughts on the Proposed Revision of Section 216's 80/20

Holmes Reversed; Co-Op Owners Held Subject to Section 280A, Joel E. Miller

Test, Joel E. Miller

Tax Court Allows Corporation to Exclude Transfer Charges as Capital Contributions, Joel E. Miller	229
Which of a Nonexempt Co-Op's Earnings are Tax-Exempt Under Subchapter T, Joel E. Miller	355
Involuntary Conversions	
Tax Considerations in Eminent Domain Proceedings, Gregory F. Wilder & William M. Shaheen	51
Depreciation	
Automatic Revenue Procedure Allows Businesses to Recoup Missed Depreciation Deductions, Victoria M. Howe	189
Dispositions	
Debt Modifications Under the Final Cottage Savings Regulations, Andrew L. Short	152
Entity Classification	
Check-the-Box Proposed Regulations: An Instant Hit, Michael Lux $.$	27
[The] Impact of the Final Check-the-Box Entity Classification Regulations on Real Estate, Craig W. Friedrich	331
Installment Sales	
Will Refinancing an Installment Sale Obligation Trigger Recognition of Gain?, Francis J. Lipman & James E. Williamson	287
International	
[The] Importance of the Section 871(d) and Section 882 Election, Marc J. Gerson	312
[An] Overview of the FIRPTA Provisions and Recent Regulatory Developments, Marc J. Gerson	91
Recent Ruling Highlights Potential Pitfall in Corporate Reorganizations Involving Foreign Investors of U.S. Real Estate, Marc J. Gerson	223
Taxation of Equity Participation Rights in U.S. Real Estate Held by Foreign Investors, Marc J.Gerson	391

Landlord-Tenant

The Proposed Section 467 Regulations: Long-Awaited Rules Introduce Complexity, Uncertainty, and Opportunities, Matthew A. Melone	261
Low Income Housing Credit	
IRS Rules that Receipt of Federal Disaster Relief Does Not Adversely Affect Amount of Low Income Housing Credit, Craig W. Friedrich .	231
Tax Credit Recapture Avoidance: The Bond Posting Exception, Michael J. Novogradac	316
Partnerships	
[A] Comprehensive Guide to Partnership Terminations, Including the Impact of the New Proposed Regulations, Blake D. Rubin & Steven B. Teplinsky	115
Proposed Regulations Simplify Tax Treatment of Surprise Partnership Terminations, William R. Charyk	87
Recent Illustrations of the IRS's Search for Economic Reality in Partnership Undertakings, William R. Charyk	220
Recently Promulgated Final Regulations Govern Partnership Distributions of Marketable Securities, William R. Charyk	383
Some Points Regarding Pension Plan Ownership of Real Estate Partnership Interests, William R. Charyk	308
Passive Activity Losses	
Final Regulations Under Section 469(c)(7): How Do You Spell Passive Loss Relief?, Robert D. Schachat	3
Recent Developments	
IRS Requires Capitalization of Lease Termination Payment Where Purpose Is Move to Owner–Occupied Premises, Paul E. Klein	
More Home Office Changes Since Soliman, Robert W. Wood	402
New Proposed Regulations Published on Liability of Limited Partners for Self-Employment Tax. Paul E. Klein	399

Section 1033 Ruled Applicable on Destruction of Principal Residence and Subsequent Sale of Land; Mortgage Interest Remains Deductible During a Reasonable Period Until Reconstruction Complete, Craig	207
W. Friedrich	326
Spouse Vacating Marital Home Pursuant to Divorce Cannot Defer Recognition of Gain on Sale Under Section 1034, Craig W. Friedrich	230
Underwater Property and Basis Limitations, John Schmalz, Mark Brumbaugh, & Roger Pillow	408
Real Estate Investment Trusts	
Recent Letter Rulings Help Clarify the Tenant Services REITs May Provide, William E. Sider	342
REIT Liability Hedges Under the IRS Hedging Regulations, David L. Brandon	167
U.S. Tax Rules Affecting Foreign Investors in REITs, Willys H. Schneider	40
Sales of Real Estate	
Sales of Real Estate With Contingent Payment Debt, Robert S. Siegel & Mary B. Doyle	243
Tax-Free Transactions	
How Do You Do an Exchange With a Special Purpose Entity, Terence Floyd Cuff	375
St. Laurent: Is There Still a Role for an Exchange Intermediary?, Terence Floyd Cuff	77
Section 1031 Not Lost by Failure to Follow Purchase Agreement or Identification of Twenty Possible Like Kind Properties, But Is Lost for Failure to Replace in 180 Days, Craig W. Friedrich	102
What Does it Mean to Receive the Designated Property in an Exchange?, Terence Floyd Cuff	296
What Is a Single Exchange? Terence Floyd Cuff	216

Vacation Homes

Does Razavi Provide a Blueprint for Section 280A Rental Agreements?, Robert L. Gardner, Boyd C. Randall, & Dave N. Stewart . . . 199